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Southern Nuclear Operating Company
Vogtle Electric Generating Plant Unit 4
ITAAC Closure Notification on Completion of ITAAC 2.6.09.15a [Index Number 655]

Ladies and Gentlemen:

In accordance with 10 CFR 52.99(c)(1), the purpose of this letter is to notify the Nuclear Regulatory Commission (NRC) of the completion of Vogtle Electric Generating Plant (VEGP) Unit 4 Inspections, Tests, Analyses, and Acceptance Criteria (ITAAC) Item 2.6.09.15a [Index Number 655]. This ITAAC confirms that a report exists and concludes that security alarm devices, including transmission lines to annunciators, are tamper indicating and self-checking and that alarm annunciation indicates the type of alarm and location. This ITAAC also confirms that a report exists and concludes that equipment is capable of recording each onsite security alarm annunciation, including the location of the alarm, false alarm, alarm check, and tamper indication; and the type of alarm, location, alarm circuit, date, and time. The closure process for this ITAAC is based on the guidance described in Nuclear Energy Institute (NEI) 08-01, “Industry Guideline for the ITAAC Closure Process Under 10 CFR Part 52,” which was endorsed by the NRC in Regulatory Guide 1.215.

This letter contains no new NRC regulatory commitments. Southern Nuclear Operating Company (SNC) requests NRC staff confirmation of this determination and publication of the required notice in the Federal Register per 10 CFR 52.99.

If there are any questions, please contact Kelli Roberts at 706-848-6991.

Respectfully submitted,

Jamie Coleman

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Regulatory Affairs Director Vogtle 3 & 4

Enclosure: Vogtle Electric Generating Plant (VEGP) Unit 4
Completion of ITAAC 2.6.09.15a [Index Number 655]

JMC/CSS/sfr

cc: Regional Administrator, Region ll
Director, Office of Nuclear Reactor Regulation (NRR)
Director, Vogtle Project Office NRR
Senior Resident Inspector – Vogtle 3 & 4

Southern Nuclear Operating Company
ND-23-0117
Enclosure

Vogtle Electric Generating Plant (VEGP) Unit 4
Completion of ITAAC 2.6.09.15a [Index Number 655]

ITAAC Statement

Design Commitment

15.a) Security alarm devices, including transmission lines to annunciators, are tamper indicating and self-checking (e.g., an automatic indication is provided when failure of the alarm system or a component occurs, or when on standby power). Alarm annunciation shall indicate the type of alarm (e.g., intrusion alarms and emergency exit alarm) and location.

16. Equipment exists to record onsite security alarm annunciation, including the location of the alarm, false alarm, alarm check, and tamper indication; and the type of alarm, location, alarm circuit, date, and time.

Inspections/Tests/Analyses

A test will be performed to verify that security alarms, including transmission lines to annunciators, are tamper indicating and self-checking (e.g., an automatic indication is provided when failure of the alarm system or a component occurs, or when on standby power) and that alarm annunciation indicates the type of alarm (e.g., intrusion alarms and emergency exit alarms) and location.

Test, analysis, or a combination of test and analysis will be performed to ensure that equipment is capable of recording each onsite security alarm annunciation, including the location of the alarm, false alarm, alarm check, and tamper indication; and the type of alarm, location, alarm circuit, date, and time.

Acceptance Criteria

A report exists and concludes that security alarm devices, including transmission lines to annunciators, are tamper indicating and self-checking (e.g., an automatic indication is provided when failure of the alarm system or a component occurs, or when the system is on standby power) and that alarm annunciation indicates the type of alarm (e.g., intrusion alarms and emergency exit alarms) and location.

A report exists and concludes that equipment is capable of recording each onsite security alarm annunciation, including the location of the alarm, false alarm, alarm check, and tamper indication; and the type of alarm, location, alarm circuit, date, and time.

ITAAC Determination Basis

Testing of the security computer system was performed to verify that security alarm devices, including transmission lines to annunciators, are tamper indicating and self-checking (e.g., an automatic indication is provided when failure of the alarm system or a component occurs, or when the system is on standby power) and that Central Alarm Station (CAS) and Secondary Alarm Station (SAS) alarm annunciation indicates the type of alarm (e.g., intrusion alarms and emergency exit alarms) and location, and that the security computer system security alarm recording equipment is capable of recording each onsite security alarm annunciation, including the location of the alarm, false alarm, alarm check, and tamper indication; and the type of alarm, location, alarm circuit, date, and time. The VEGP Unit 4 Plant Security System ITAAC only cover the Unit 4 plant security system design commitment scope.

A report exists and concludes that security alarm devices, including transmission lines to annunciators, are tamper indicating and self-checking (e.g., an automatic indication is provided when failure of the alarm system or a component occurs, or when the system is on standby power) and that alarm annunciation indicates the type of alarm (e.g., intrusion alarms and emergency exit alarms) and location.

Testing of the security computer system was performed to verify that Unit 4 security alarm devices, including transmission lines to annunciators, are tamper indicating and self-checking (e.g., an automatic indication is provided when failure of the alarm system or a component occurs, or when the system is on standby power) and that CAS and SAS alarm annunciation indicates the type of alarm (e.g., intrusion alarms and emergency exit alarms) and location, and satisfies the applicable security alarm device and alarm annunciation requirements of the VEGP Units 1-4 Physical Security Plan associated with 10 CFR 73.55(i)(3).

Testing was performed as described in ITAAC Technical Report SV4-SES-ITR-800655 (Reference 1) for the Unit 4 security alarm devices identified in the Vogtle Plant Security System Database (Reference 2), including the associated security alarm device transmission lines, to confirm the security alarm devices are tamper indicating and self-checking (e.g., an automatic indication is provided when failure of the alarm system or a component occurs, or when the system is on standby power), and that CAS and SAS alarm annunciation indicates the type of alarm (e.g., intrusion alarms and emergency exit alarms) and location. Specifically, the test documentation described in Reference 1:

> Tests each of the tamper indication security devices identified in Reference 2 by initiating a tamper signal at the tamper indication device and confirming that the resulting CAS and SAS alarm annunciation indicates the type of alarm (tamper) and its location.
>
> Tests the self-checking function of the security alarm system by failing the security alarm system signal connectivity to the security alarm annunciators in each of the security alarm system transmission lines, causing a failure signal for each security alarm device identified in Reference 2, and by supplying power to the security alarm system from a standby source of power; and confirming that a self-checking automatic indication is provided in CAS and SAS when failure of the security alarm system or component occurs, or when the security alarm system is supplied power from a standby power source.
>
> Tests each of the security alarm devices identified in Reference 2 by initiating a security device alarm signal and confirming that the resulting CAS and SAS alarm annunciation indicates the type of alarm and its location.

The test results are summarized as a report in Reference 1 and conclude that Unit 4 security alarm devices, including transmission lines to annunciators, are tamper indicating and self-checking (e.g., an automatic indication is provided when failure of the alarm system or a component occurs, or when the system is on standby power) and that alarm annunciation indicates the type of alarm (e.g., intrusion alarms and emergency exit alarms) and location.

A report exists and concludes that equipment is capable of recording each onsite security alarm annunciation, including the location of the alarm, false alarm, alarm check, and tamper indication; and the type of alarm, location, alarm circuit, date, and time.

Testing of the security computer system was performed to verify that the security computer system security alarm recording equipment is capable of recording each Unit 4 onsite security alarm annunciation, including the location of the alarm, false alarm, alarm check, and tamper indication; and the type of alarm, location, alarm circuit, date, and time, and satisfy the applicable onsite alarm annunciation recording requirements of the VEGP Units 1-4 Physical Security Plan associated with 10 CFR 73.70(f).

Testing was performed as described in ITAAC Technical Report SV4-SES-ITR-800655 (Reference 1) for the Unit 4 security computer system security alarm recording equipment by initiating an alarm signal for each of the security alarm devices identified in Reference 2 and confirming that, for each alarm signal, the security computer system records the security alarm annunciation including location of the alarm, type of alarm (including tamper indication alarms), alarm circuit, date, and time. Reference 1 also confirmed that a false alarm cause code (e.g., nuisance) or alarm check code (e.g., operational test) can be recorded in the alarm summary or event summary record.

The test results are summarized as a report in Reference 1 and conclude that Unit 4 security computer system security alarm recording equipment is capable of recording each Unit 4 onsite security alarm annunciation, including the location of the alarm, false alarm, alarm check, and tamper indication; and the type of alarm, location, alarm circuit, date, and time.

References 1 and 2 are available for NRC inspection as part of the Unit 4 ITAAC 2.6.09.15a Completion Package (Reference 3).

ITAAC Finding Review

In accordance with plant procedures for ITAAC completion, Southern Nuclear Operating Company (SNC) performed a review of all findings pertaining to the subject ITAAC and associated corrective actions. This review found there were no relevant ITAAC findings associated with this ITAAC. The ITAAC completion review is documented in the ITAAC Completion Package for ITAAC 2.6.09.15a (Reference 3) and is available for NRC review.

ITAAC Completion Statement

Based on the above information, SNC hereby notifies the NRC that ITAAC 2.6.09.15a was performed for VEGP Unit 4 and that the prescribed acceptance criteria were met.

Systems, structures, and components verified as part of this ITAAC are being maintained in their as-designed, ITAAC compliant condition in accordance with approved plant programs and procedures.

References (available for NRC inspection)

1. SV4-SES-ITR-800655, Unit 4 Alarm and Circuit Supervision Testing: ITAAC 2.6.09.15a, Rev 0 (SRI)
2. SV0-SES-J0X-800000, Vogtle Plant Security System Database, Rev 9 (SRI)
3. 2.6.09.15a-U4-CP-Rev0, ITAAC Completion Package